MOTION TO EXTEND TIME

United States Patent And Trademark Office

Trademark Trial and Appeal Board

PO Box 1451

Alexandria, VA 22313-1451   **TTAB**

Mailed: September 30, 2013

Petition For Cancellation No. 92057717

U.S. Registration No. 3,738,107

Samuel Katzin-Simon

v.

Ambrea C. Hanson

Motion to Extend Time

I, Ambrea C. Hanson, owner of U.S. Reg. No. 3,738,107 for the mark CHIEKI, hereby respectfully motion the Trademark Trial and Appeal Board to grant extension of time to answer petition of cancellation No. 92057717 (pursuant to section 509.01 set forth in TBMP chapter 500 Stipulations and Motions), Samuel Katzin-Simon (Petitioner) v. Ambrea C. Hanson (Registrant).

As grounds therefore, Registrant shows that good cause is evident and a request for extension of time is required to identify the Petitioner with reasonable certainty, investigate claims alleged, confer with counsel, and engage in settlement discussions with Petitioner as directed by counsel. Furthermore, extension of time is required due to delay of receipt of Petition For Cancellation due to ineffective service on Registrant (also referred to as 'Defendant') as a result of simultaneous mailing of petition documentation

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and re-location of residence of Registrant. Registrant has successfully filed the Change of Correspondence Address form in accordance with the Trademark Rules of Practice.
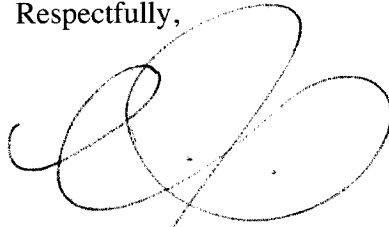
WHEREFORE, Registrant requests that Extension of Time be granted.

Dated:

September 30, 2013   Respectfully,

New Glarus, Wisconsin

Ambrea C. Hanson

419 Eighth Ave
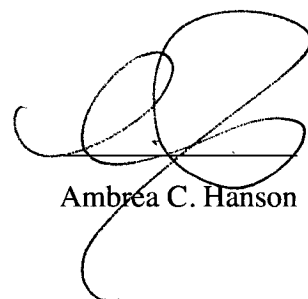
New Glarus, WI 53574

608-636-0166

ambreahanson@me.com

CERTIFICATE OF SERVICE

<u>CERTIFICATE OF SERVICE</u>

The undersigned certifies that a copy of this Motion To Extend Time was sent by U.S. mail to Samuel Katzin-Simon (Petitioner), 200 Park Avenue South, #25697, New York, NY 10003, and Susan Upton Douglass (Attorney for Petitioner), Fross Zelnick Lehrman & Zissu, P.C., 866 United Nations Plaza, New York, NY 10017, this 30th day of September 2013.

Ambrea C. Hanson